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PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

IN RE	§	
	§	
EVEREADY SERVICES, INC	§	Case No. 20-30225
	§	
	§	
DEBTOR	§	

MOTION FOR DISTRIBUTION

**NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION OR REQUEST FOR HEARING IS FILED WITH THE UNITED STATES BANKRUPTCY CLERK, 1100 COMMERCE STREET, 12<sup>TH</sup> FLOOR DALLAS, TEXAS 75242, WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF THE FILING OF THIS MOTION, UNLESS THE COURT, SUA SPONTE, OR UPON TIMELY APPLICATION OF A PARTY IN INTEREST, SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION OR REQUEST FOR HEARING.**

**IF NO OBJECTION OR REQUEST FOR HEARING IS TIMELY FILED, THE MOTION SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. THE COURT RESERVES THE RIGHT TO SET ANY MATTER FOR HEARING.**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Eveready Services, Inc (“Eveready”) Debtor in the above styled and numbered cause and files this its Motion for Distribution (“Motion”) and in support thereof would

respectfully show unto the Court as follows:

1. This Court has jurisdiction over this proceeding and the parties and property affected hereby pursuant to 28 U.S.C. §§1334 and 157.
2. The Debtor commenced this proceeding on January 23, 2020 by filing a voluntary petition under Chapter 11 of the United States Bankruptcy Code. Since the filing of the petition, the Debtor has remained in possession of its assets and continued in operation of its business as a debtor-in-possession pursuant to 11 U.S.C. §§1107 and 1108.
3. The Debtor's business consisted on the ownership of a storage and moving facility Dallas, Texas.
4. Pursuant to Court Order, the all the assets of the Debtor were sold.
5. Pursuant to Court order the sales proceeds are currently being held in the Debtor in Possession account awaiting further Court order.
6. The Ad Valorem tax creditors and the Internal Revenue Service has asserted liens against the sales proceeds.
7. The sales proceeds will not exceed the amount of funds currently on hand.
8. The Debtor seeks an Order from the Court allowing it to distribute the sales proceeds to the ad valorem tax creditors and the remaining balance to the Internal Revenue Service.

WHEREFORE, PREMISES CONSIDERED, the Debtor would request the Court enter an order approving the distributions set for above, and for such other and further relief as it may show itself justly entitled.

Respectfully submitted,

Eric A. Liepins  
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By: /s/ Eric Liepins  
Eric A. Liepins, SBN 12338110

PROPOSED ATTORNEY FOR DEBTOR

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion was sent via ECF or mail to all creditors of the estate on this the 19th day of June 2020.

/s/ Eric Liepins  
Eric A. Liepins